

**Subject: Report on progress of site preparation activities**  
**San Jacinto River Waste Pits TCRA**  
**06ZQ**  
**Lake Highlands, TX**  
**Latitude: 29.7944000 Longitude: -95.0625000**

To Valmichael Leos, RPM

**From:** Jordan Jones - Dynamac Corporation  
**Date:** 12/16/2010  
**Reporting Period:** 12/14/2010 thru 12/15/2010

## **1. Introduction**

### **1.1 Background**

<b>Site Number:</b>	06ZQ	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	4/2/2010
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	PRP Oversight
<b>Response Lead:</b>	PRP	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	12/8/2010	<b>Start Date:</b>	12/8/2010
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	TXN000606611	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### **1.1.1 Incident Category**

RP lead CERCLA time critical removal action

#### **1.1.2 Site Description**

The site encompasses approximately 25 acres. The removal action is to stabilize the site by designing and constructing a physical protective barrier surrounding waste ponds 1 and 2 that temporarily abates the release of polychlorinated dibenzo-p-dioxins and polychlorinated dibenzofurans (and possibly PCBs) into the San Jacinto River, until the site is fully characterized and a remedy is selected.

##### **1.1.2.1 Location**

The Site is in Harris County in the State of Texas. The Site itself has no specific street address. The Site is comprised of two waste ponds with three surface impoundments built in the 1960's. The ponds and impoundments are situated on a partially submerged 20-acre

parcel of real property. The Site is located on the western bank of the San Jacinto River, in Harris County, Texas, immediately north of the Interstate Highway 10 (I-10) bridge over the San Jacinto River. Available information indicates the two waste ponds were built during 1965 by constructing berms within the estuarine area just north of what was then Texas State Highway 73 and is now I-10, west of the main river channel, east of the City of Houston, between two unincorporated areas known as Channelview and Highlands.

#### **1.1.2.2 Description of Threat**

The waste paper sludge was placed in the two ponds on the Site. Waste pond 1 is located on the western portion of the Site totaling 132,386 square feet. Waste pond 2 which consists of two surface impoundments are on the eastern portion of the Site totaling 46,182 square feet and 188,641 square feet respectively. Currently, the Site is inactive and approximately half of the Site's surface area, including the abandoned waste disposal ponds, is now submerged below the adjacent San Jacinto River's water surface. Waste pond 1 with one impoundment is partially submerged and waste pond 2 with the two impoundments is completely submerged in the San Jacinto River.

#### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

The primary hazardous substances documented at the Site are polychlorinated dibenzodioxins and polychlorinated dibenzofurans. At the time of the signing of the Action Memo, dioxin concentrations as high as 41,300 parts per trillion have been found in sediment samples collected from the Site's disposal pond areas and from river sediments near the Site. Sediments contaminated with high levels of dioxin have been found in the San Jacinto River both upstream and downstream from the Site due to tidal influences. Additional sediment samples were collected in compliance with the Action Memo, dioxin concentrations as high as 360,000 parts per trillion have been found in sediment samples collected from the submerged portion of the waste disposal ponds as well as dioxin concentrations as high as 3,660 parts per trillion action level in sediment samples collected outside the original 1966 berm placement for the two waste ponds indicating the release of dioxin from the original location of the waste ponds.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.1 Narrative**

In accordance with the statement of work (SOW), in the EPA Administrative Order on Consent (AOC), the respondents International Paper Company Inc. (IP) and McGinnes Industrial Maintenance Corporation (MIMC) have 30 calendar days to begin construction for the time critical removal action. On November 8, 2010 the EPA finalized a work plan that details the construction of a temporary cap that will stabilize the release or threat of release of hazardous substances into the San Jacinto River.

#### **2.1.2 Response Actions to Date**

In accordance with the EPA approved work plan, the respondents have mobilized equipment and resources on December 8, 2010 to the site and have begun site management activities. These activities include the ordering of equipment and resources, clearing and grubbing around the lay down area, and the repair / installation of site security fencing.

### **2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

Currently, EPA is working with International Paper Company Inc. and McGinnes Industrial Maintenance Corporation under an EPA issued Administrative Order on Consent.

## **2.2 Planning Section**

### **2.2.1 Status of Site Preparation Activities**

- Installation of phase II security fencing on the Big Star property is currently ongoing and expected to be completed by Friday, December 17, 2010.
- Installation of new fencing along the TxDOT ROW commenced on December 14, 2010 and is expected to be completed before the break on December 24, 2010.
- Best efforts to obtain access from TxDOT to construct road on TxDOT's ROW are still ongoing. A decision is expected by Friday, December 17, 2010.
- Best efforts to obtain access from Big Star to use a portion of its property as a laydown/storage area are still ongoing. Other options are currently being pursued as well, including the possible use of a parcel being referred to as the "LaBarge Property" located on the west bank of the San Jacinto River, within a half-mile upstream of the San Jacinto River Waste Pits site.
- Installation of groundwater monitoring wells as part of the RI/FS is planned for the week of December 27, 2010. Some clearing and grubbing of vegetation will be required in order to allow a drilling rig access to the proposed well locations.
- Marking of impoundment trees for clearing and grubbing is currently planned for the week of December 20, 2010.
- Installation of impoundment perimeter signs and buoys in the water surrounding the impoundment is expected to commence on the week of December 20, 2010 or December 27, 2010. The signs and buoys have been received by the contractor, and concrete anchors for the buoys are currently being fabricated off-site.
- Preparation and submission of purchase orders for aggregates are currently on hold until access agreements for the TxDOT ROW and Big Star property are obtained.

- Site preparation related to the laydown/storage area, including the mobilization of a trailer to be located there, is currently on hold until an access agreement for the Big Star property is obtained.

#### **2.2.1.1 Planned Response Activities**

- Continue site preparation of lay down area and access road for mobilization of equipment and resources.

#### **2.2.2 Issues**

- As of 12/15/2010 access agreements for the Big Star Property (a.k.a. lay down area) and the Texas Department of Transportation (TxDOT) Right of Way (ROW) areas near the site have not been finalized for use by the respondents.

### **2.3 Logistics Section**

### **2.4 Finance Section**

#### **2.4.1 Narrative**

### **2.5 Safety Officer**

### **2.6 Liaison Officer**

### **2.7 Information Officer**

#### **2.7.1 Public Information Officer**

#### **2.7.2 Community Involvement Coordinator**

## **3. Participating Entities**

### **3.1 Unified Command**

### **3.2 Cooperating and Assisting Agencies**

## **4. Personnel On Site**

## **5. Definition of Terms**

## **6. Additional sources of information**

### **6.1 Internet location of additional information/reports**

### **6.2 Reporting Schedule**

## **7. Situational Reference Materials**